

MEMO ENDORSED

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July 1, 2025

VIA ECF

The Honorable Valerie E. Caproni, U.S.D.J.
United States District Court
Southern District of New York
Courtroom 20C
500 Pearl Street, Chambers 1930
New York, NY 10007

USDC SDNY
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Re: *Xue Heidi Feng v. Nomura Securities International, Inc.*
Civil Action No.: 1:24-CV-00467-VEC

Dear Judge Caproni:

We are counsel to Plaintiff Xue Heidi Feng (“Ms. Feng” or “Plaintiff”) in the above-captioned action.

Pursuant to Rule 5(B)(ii) of the Court’s Individual Practices in Civil Cases (Revised: March 17, 2025), we write to request the Court’s permission to submit Plaintiff’s papers (a) in opposition to Working Solutions Law Firm’s Motion for the Fixing of Its Fees and Costs Under Its Statutory Charging Lien (the “WS Motion”) and (b) in support of Ms. Feng’s concomitant Cross-Motion to Compel Arbitration, *ex parte* as to Defendant Nomura Securities International, Inc., and under seal. The Court has previously granted the letter request, dated May 6, 2025, of Working Solutions, by its partner, Rachel M. Haskell, Esq. (“Ms. Haskell”), to seal its motion papers (See Doc. Nos. 56 and 58, respectively, with the Court’s Memo Endorsement). In this letter request, we simply seek the same treatment for Ms. Feng’s submissions, for the reasons set forth in Ms. Haskell’s May 6th letter.

We note that Working Solutions has confirmed, in writing, its consent to our request to file under seal.

We will, of course, comply with Rule 5(B)’s requirement to provide, via mail or hand-delivery, a courtesy copy of the entirety of our submissions, as well as any further instructions in any Memo Endorsement made by the Court to this letter.

McLAUGHLIN & STERN, LLP

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We thank the Court for its continuing consideration in this matter.

Respectfully yours,

McLAUGHLIN & STERN, LLP

By: 
Paul H. Levinson

cc: Rachel M. Haskell, Esq. (Via ECF and email)
Christopher Davis, Esq. (Via ECF and email)

Application GRANTED.

SO ORDERED.

7/1/2025



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE